

***IN THE DISTRICT COURT OF THE UNITED STATES***

***for the Western District of New York***

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**NOVEMBER 2015 GRAND JURY  
(Impaneled 11/13/15)**

**THE UNITED STATES OF AMERICA**

**SUPERSEDING  
INDICTMENT**

**-vs-**

**15-CR-239-A**

**HECTOR CARATTINI a/k/a Lagrima,  
MICHAEL PEREZ,  
JUAN OLIVERIAS-ARBELO a/k/a Mikey,  
MARK GONZALEZ,  
ADALBERTO CRUZ,  
MAIKEL GONZALEZ,  
ALBERTO FERNANDEZ a/k/a Gordo,  
RAYMOND DEJESUS,  
HECTOR HUERTAS a/k/a Hector Rivera, and  
KRISTIE BONCORE**

**Violation:**  
Title 21, United States Code,  
Section 846  
(1 Count and Forfeiture Allegation)

**COUNT 1**

**(Conspiracy to Possess with Intent to Distribute,  
and to Distribute, 100 Grams or More of Heroin)**

**The Grand Jury Charges That:**

Between in or about the Fall of 2013, the exact date being unknown, and on or about September 28, 2015, in the Western District of New York, and elsewhere, the defendants, **HECTOR CARATTINI a/k/a Lagrima, MICHAEL PEREZ, JUAN OLIVERIAS-ARBELO a/k/a Mikey, MARK GONZALEZ, ADALBERTO CRUZ, MAIKEL GONZALEZ, ALBERTO FERNANDEZ a/k/a Gordo, RAYMOND DEJESUS, HECTOR HUERTAS a/k/a Hector Rivera, and KRISTIE BONCORE**, did knowingly,

willfully and unlawfully combine, conspire and agree together and with others, known and unknown, to commit the following offenses, that is, to possess with intent to distribute, and to distribute, 100 grams or more of a mixture and substance containing heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

**All in violation of Title 21, United States Code, Section 846.**

**FORFEITURE ALLEGATION**

**The Grand Jury Alleges That:**

Upon conviction of the offense set forth in Count 1 of this Indictment, the defendants, **HECTOR CARATTINI a/k/a Lagrima, MICHAEL PEREZ, JUAN OLIVERIAS-ARBELO a/k/a Mikey, MARK GONZALEZ, ADALBERTO CRUZ, MAIKEL GONZALEZ, ALBERTO FERNANDEZ a/k/a Gordo, RAYMOND DEJESUS, HECTOR HUERTAS a/k/a Hector Rivera, and KRISTIE BONCORE**, each of them severally and jointly, shall forfeit to the United States all right, title and interest to any property constituting and derived from any proceeds obtained, directly and indirectly, as a result of such violations and any and all property used, and intended to be used, in any manner and part, to commit and to facilitate the commission of such violations, including, but not limited to the following:

**MONETARY AMOUNT:**

The sum of TWO HUNDRED FIFTY THOUSAND DOLLARS (\$250,000.00) Dollars in United States currency, to be evidenced by a judgment issued by this Court against the defendants. Said judgment will be referenced in the Preliminary Order of Forfeiture and will provide for interest to accrue at the prevailing rate per annum and serve as a lien against the defendants' property, wherever situated, until fully satisfied.

### **SUBSTITUTE ASSETS**

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 981(b) and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above property.

**All pursuant to Title 21, United States Code, Sections 853(a)(1) and 853(p).**

DATED: Buffalo, New York, January 5, 2016.

WILLIAM J. HOCHUL, JR.  
United States Attorney

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A TRUE BILL:

s/FOREPERSON